IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF WYOMING

MICHAEL STEIMLE, individually; MICHAEL STEIMLE, derivatively on behalf of and in the right of AZURE HOLDING GROUP, LLC, a Wyoming Limited Liability Company,

Case No. 2:24-cv-00114-ABJ

No. CH-2024-0000010

Plaintiffs,

Removed from Wyoming Chancery Court

VS.

ANDREW THOMPSON, individually;

Defendant.

MOTION FOR LEAVE TO FILE REPLY

Defendant Andrew Thompson ("Defendant"), through undersigned counsel, requests leave to file the brief, attached hereto as Exhibit 1, in reply to Plaintiffs' Opposition to Defendant's Emergency Motion to Dissolve Ex-Parte Temporary Restraining Order or, in the Alternative, to Stay Enforcement (ECF No. 19). The grounds for this request are as follows:

- After Defendant Thompson filed his Emergency Motion to Dissolve, Defendant Thompson's counsel came into possession of additional documents provided by Azure Renewables' Costa Rican counsel that have a significant bearing on the key issue of whether this Court should, or even can, unwind the unanimous Azure Renewables' vote removing Plaintiff Michael Steimle as President based on his misconduct. The additional documents are attached to the proposed Reply as an nuexhibit and discussed in the Reply.
- Steimle's Opposition raises a number of arguments not addressed in the Motion to Dissolve, including an argument related to this Court's jurisdiction. The proposed Reply provides Thompson with an ability to respond to those issues raised for the first time in Steimle's Opposition.
- The ex parte TRO entered by the Wyoming Chancery Court on Friday, May 31, at 3:28 p.m. Mountain Time required significant action by Defendant Thompson by the following Monday, June 2, at 5 pm. Thus, Thompson's counsel was forced to quickly put together the Motion to Dissolve and needed to file same during the early part of the day on June 2. Given this set of circumstances, the proposed Reply

provides Thompson with a more full and fair opportunity to respond to Steimle's request for the extraordinary relief of a TRO.

We have conferred with counsel for Plaintiff via phone and email. Counsel for Plaintiff opposes Defendants filing of the motion for leave to file reply.

DATED: June 14, 2024 Respectfully submitted,

/s/ Ghislaine G. Torres Bruner
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CERTIFICATE OF SERVICE

This is to certify that the foregoing **MOTION FOR LEAVE TO FILE REPLY** was served on the following counsel of record via the Court's electronic filing system and by email on June 14, 2024.

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Attorneys for Plaintiff Michael Steimle

/s/ Ghislaine G. Torres Bruner Ghislaine G. Torres Bruner